

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

VERIZON FLORIDA LLC,)	
)	
Complainant,)	Docket No. 15-73
)	File No. EB-15-MD-002
v.)	
)	Related to
FLORIDA POWER AND LIGHT)	Docket No. 14-216
COMPANY,)	File No. EB-14-MD-003
)	
Respondent.)	

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COMMISSION CLERK

**RESPONDENT FLORIDA POWER AND LIGHT COMPANY'S
MOTION FOR LEAVE TO FILE**

Respondent Florida Power and Light Company (“FPL”), by and through its attorneys, respectfully submits this Motion for Leave to File and requests that the Bureau grant FPL leave to submit the accompanying Motion to Allow Discovery and Extend Time to Respond to the Complaint, which asks that the Bureau: (i) allow the parties to propound and serve discovery in an expedited fashion in order to provide for a complete and accurate record on which the Commission can base its decision in this matter; and, (ii) extend the time for FPL to file a response to the Complaint from April 13, 2015 to June 12, 2015.

1. As more fully discussed in the attached Motion to Allow Discovery and Extend Time to Respond to the Complaint, FPL files this motion in an effort to help create an efficient but thorough process to develop a complete and accurate record in this proceeding. Based on its preliminary review to date of the Complaint, FPL believes that limited discovery will be required

to respond to the specific factual assertions and analyses in the Complaint and provide a complete record for the Commission.

2. In the accompanying Motion to Allow Discovery and Extend Time to Respond to the Complaint, FPL requests that the Commission extend the time for FPL to file a response to the Complaint from April 13, 2015 to June 12, 2015. A reasonable extension such as this will allow time for Verizon to file a reply. Further, this extension will allow time for the Commission to issue a decision prior to September 2015, which is the month in which the Florida court has set the related state court action for trial, as more fully explained in the attached motion.

3. Good cause therefore exists to permit the filing and consideration of the Motion to Allow Discovery and Extend Time to Respond to the Complaint.

For the foregoing reasons, FPL respectfully requests that the Commission grant it leave to file the attached Motion to Allow Discovery and Extend Time to Respond to the Complaint.

Respectfully submitted,



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Dated: April 1, 2015

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2015, I caused a copy of the foregoing Respondent's Motion for Leave to be filed via the Federal Communications Commission's Electronic Comment Filing System and to be served on the following (service method indicated):

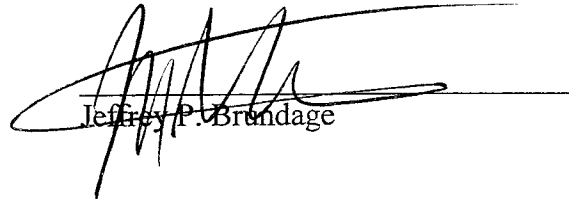
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